

TONY WEST
Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director
CARLOTTA P. WELLS
Senior Trial Counsel
United States Department of Justice
Civil Division
Federal Programs Branch
Post Office Box 883
Washington D.C. 20044
Tel: (202) 514-4522
Fax: (202) 616-8470
carlotta.wells@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOSHUA GERSTEIN,)	Case No. C 06-04643 MMC
)	
Plaintiff,)	STIPULATION TO CONSOLIDATE
)	MOTION HEARING DATES FOR
v.)	JULY 30, 2010
)	
CENTRAL INTELLIGENCE AGENCY,)	Date: July 9, 2010/July 30, 2010
et al.,)	Time: 9:00 a.m.
)	Courtroom 7, 19th Floor
Defendants.)	Hon. Maxine M. Chesney

The parties hereby stipulate to consolidate the hearing dates scheduled for the motions pending before the Court for the later date, or July 30, 2010. The bases for this stipulation are as follows:

1. Defendants filed their second renewed motion for summary judgment on May 21, 2010. A hearing for this motion was noticed for July 9, 2010.
2. Plaintiff filed a renewed cross motion for partial summary judgment on June 17, 2010, setting a hearing on July 30, 2010.
3. Both defendants' and plaintiff's motions are fully briefed.
4. The parties agree that the issues set forth in the pending motions can be resolved during the course of one hearing rather than two. Further, given the schedules of both plaintiff and

defendants' counsel, the parties stipulate to schedule the consolidated hearing on July 30, 2010.

Accordingly, the parties stipulate to schedule a single hearing on the pending motions on July 30, 2010.

Respectfully submitted,

JOSHUA GERSTEIN

TONY WEST
Assistant Attorney General

/s/

Plaintiff

/s/

Carlotta P. Wells
Senior Trial Counsel
United States Department of Justice
Civil Division
Federal Programs Branch

Dated: July 7, 2010

Dated: July 7, 2010

~~[PROPOSED]~~ ORDER

Upon consideration of the parties' stipulation, a consolidated hearing on the pending motions is scheduled for July 30, 2010.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 8, 2010 /s/ CHARLES R. BREYER for

/s/ CHARLES R. BREYER for

MAXINE M. CHESNEY
United States District Judge